



Hogan Lovells US LLP  
Columbia Square  
555 Thirteenth Street, NW  
Washington, DC 20004  
T +1 202 637 5600  
F +1 202 637 5910  
www.hoganlovells.com

March 29, 2019

**VIA IBFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Ex Parte* Letter**  
**Space Exploration Holdings, LLC, IBFS File No. SAT-MOD-20181108-00083**

Dear Ms. Dortch:

On March 27, 2019, representatives of Planet Labs Inc. (“Planet”) met with representatives of the International Bureau and the Office of Engineering and Technology regarding the above-referenced proceeding. The following individuals participated in the meeting on behalf of Planet: Craig Scheffler, Technical Program Manager – RF Spectrum Management; Tony Lin, outside counsel for Planet; and Sarah Leggin, outside counsel for Planet. The following people participated in the meeting on behalf of the FCC: Jose Albuquerque, Satellite Division Chief; Karl Kensinger, Deputy Division Chief; Stephen Duall, Policy Branch Chief; Cindy Spiers, Policy Branch Attorney Advisor; Sankar Persaud, Engineering Branch Engineer; and Anthony Serafini, Experimental Licensing Branch Chief (by phone).

In the meeting, Planet reiterated its request, stated in the Petition to Defer the modification application of Space Exploration Holdings, LLC (“SpaceX”), to defer any grant of the application pending SpaceX’s submission of a collision risk analysis.<sup>1</sup> Such an analysis would allow Planet and other operators to assess the operational feasibility and credibility of SpaceX’s commitment to assume the burden of conducting collision avoidance maneuvers.

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<sup>1</sup> Planet Labs Inc., Petition to Defer, File No. SAT-MOD-20181108-00083 (Jan. 29, 2019); *see also* Commercial Smallsat Spectrum Management Association, Joint Reply, File No. SAT-MOD-20181108-00083 (Feb. 22, 2019).

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically in the above-referenced proceeding. Please direct any questions regarding this letter to the undersigned.

Respectfully submitted,

/s/ Tony Lin

Tony Lin  
Counsel  
tony.lin@hoganlovells.com  
D 1+ 202 637 5795

cc: (via email)  
Jose Albuquerque  
Karl Kensinger  
Stephen Duall  
Cindy Spiers  
Sankar Persaud  
Anthony Serafini